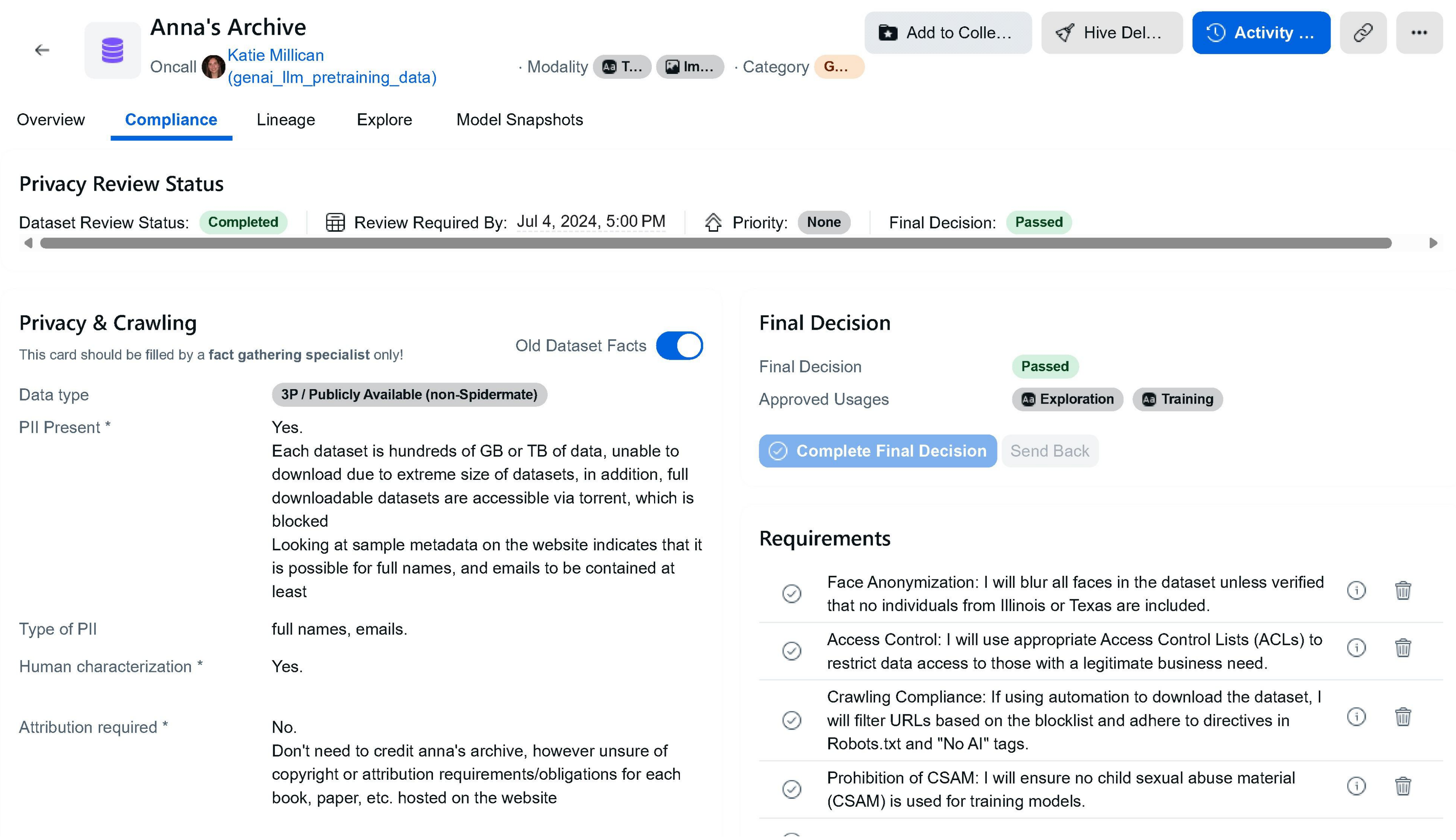
EXHIBIT J



Anna's Archive

Oncall Katie Millican (genai_llm_pretraining_data) · Modality T… Im… · Category G…

Privacy Review Status

Dataset Review Status: Completed | Review Required By: Jul 4, 2024, 5:00 PM | Priority: None | Final Decision: Passed

Privacy & Crawling

This card should be filled by a **fact gathering specialist** only!

Old Dataset Facts ●

Data type	3P / Publicly Available (non-Spidermate)
PII Present *	Yes. Each dataset is hundreds of GB or TB of data, unable to download due to extreme size of datasets, in addition, full downloadable datasets are accessible via torrent, which is blocked Looking at sample metadata on the website indicates that it is possible for full names, and emails to be contained at least
Type of PII	full names, emails.
Human characterization *	Yes.
Attribution required *	No. Don't need to credit anna's archive, however unsure of copyright or attribution requirements/obligations for each book, paper, etc. hosted on the website

Final Decision

Final Decision	Passed
Approved Usages	Exploration Training

Requirements

✓ Face Anonymization: I will blur all faces in the dataset unless verified that no individuals from Illinois or Texas are included.

✓ Access Control: I will use appropriate Access Control Lists (ACLs) to restrict data access to those with a legitimate business need.

✓ Crawling Compliance: If using automation to download the dataset, I will filter URLs based on the blocklist and adhere to directives in Robots.txt and "No AI" tags.

✓ Prohibition of CSAM: I will ensure no child sexual abuse material (CSAM) is used for training models.

Robots.txt disallow *	Yes. User-agent: * Crawl-delay: 10 Disallow: /db Disallow: /slow_download Disallow: /fast_download Disallow: /torrents Disallow: /search Disallow: /scidb
Contains 1PD *	No. Each downloadable dataset is hundreds of GB or TB of data, unable to download due to extreme size of datasets. Did not observe 1PD in the observable data
Login required for download *	No.
Scraping prohibited in TOS *	No. Claims all code and data is open source Unsure of copyright requirements/obligations for each book, paper, etc. hosted on the website
Scraping notes *	Previously reviewed in #D625 in spreadsheet. If you are interested in mirroring this dataset for archival or LLM training purposes, please contact us. Claims all code and data is open source. Sample metadata indicates that links from various news sources like NYTimes is contained
Download considerations *	Full datasets require download via torrent Can also search one off books, articles, etc on the website that can be dowloaded
Contract or TPA number	No contract or TPA number

✓ Data Retention Limit: I will not retain data for longer than 1095 days.

✓ Handling of 1PD in 3PD Dataset: If I detect first-party data (1PD) in the 3PD dataset, I will cease its use and consult the Dataset Review Team.

Activity & Comments

Type a comment

Morphing Framework Bot added source: https://annas-archive.org/
February 17, 10:36 AM · Like

Morphing Framework Bot updated modalities to [text, image]
January 8, 6:36 AM · Like

Morphing Framework Bot created this AIDC Dataset.
December 9, 2024 · Like

Morphing Framework Bot made several changes
December 9, 2024 · Hide updates

added the tag genai.

added the tag aidc_bespoke.

TDM Processor Completed the stage Requirements
September 16, 2024 · Like

Christian Montez updated the "Final Decision" to "PASSED"
July 31, 2024 · Like

Luc Dahlin made several changes

July 31, 2024 · Hide updates

updated the "Ip Legal Notes" to Redacted - Privilege

Redacted - Privilege

updated the "Ip Legal Approval Status" to Redacted - Privilege

Alisa Hall made several changes

July 29, 2024 · Hide updates

updated the "Product Counsel Approval Status" to Redacted - Privilege

updated the "Product Counsel Notes" to Redacted - Privilege

Christian Montez made several changes

July 29, 2024 · Hide updates

updated the "Privacy Risk Level" to "High"

updated the "Privacy Notes" to "High risk dataset - new use cases / usage in new models requires additional review and director level approval"

updated the "Privacy Approval Status" to "Approved"

updated the "Other" to "IP Policy Analysis:

As IP Policy has previously noted with respect to GenAI training on content from sites such as LibGen that contain pirated content, policymakers will take a negative view of such sites and their use (irrespective of any legal concerns), and such concerns may contribute to spurring future regulatory efforts and/or complicate our efforts to build goodwill with governments on AI regulation, especially in the US & Europe. In addition to these previously-flagged policy risks, several recent developments heighten the policy risks:

In June, OpenAI made public a statement (https://www.copyright.gov/policy/artificial-intelligence/ex-parte-communications/letters/OpenAI-June-4-2024.pdf) that it avoids crawling “sites that are known to engage in IP infringement, such as the ‘notorious markets’ identified annually by the Office of the U.S. Trade Representative.”
Mark has recently been engaging with high-level U.S. government officials on LLaMA and our AI strategy, including Sec. Raimondo and NSA Jake Sullivan, and because of OpenAI’s statement, this is now a question that could arise in such engagements (indeed, Commerce in particular, takes strong stands on IP piracy matters).
In a hearing last December, Rep. Deborah Ross (D-NC) questioned Matt Schruers , the head of our trade association CCIA about his members’ use of pirate web sites, including Sci-Hub, for training AI.
The growing popularity of transparency obligations, from the EU AI Act to bills introduced in Congress and elsewhere, suggests that what we train on will be public sooner rather than later.

The fact that we train on pirated sites such as Anna's Archive is likely to be viewed negatively by policymakers, rightsholders, and other stakeholders.

POLICY VIEW AND RECOMMENDATION:
On balance, Policy doesn't view these developments as categorically changing the risks flagged earlier, and thus at this time, we are not seeking to reopen the prior decision w.r.t the content from Anna's archive.
To mitigate these emerging policy risks, however, we recommend that we commit to not training on other "notorious sites (https://ustr.gov/sites/default/files/2023_Review_of_Notorious_Markets_for_Counterfeiting_and_Piracy_Notorious_Markets_List_final.pdf)" besides Anna's archive.
"

Ramakant Shankar made several changes
July 23, 2024 · Hide updates

changed the description. · View Changes

added the tag aidc_bespoke.

Christian Montez made several changes
July 11, 2024 · Hide updates

updated the "Review Status" to "COMPLETED"

updated the "Final Decision" to "BLOCKED_DUE_TO_ESCALATION"

Fatima Jafri made several changes
July 11, 2024 · Hide updates

updated the "Product Counsel **Redacted - Privilege**

updated the "Product Counsel Approval Status" to **Redacted - Privilege**

updated the "Product Counsel Notes" to **Redacted - Privilege**

Tyler Robbins updated the "Ip Legal Approval Status" to **Redacted - Privilege**
July 5, 2024 · Like

Luc Dahlin made several changes
July 5, 2024 · Hide updates

updated the "Ip Legal **Redacted - Privilege**

- updated the "Ip Legal Approval Status" to Redacted - Privilege
- updated the "Ip Legal Notes" to "Note for product counsel: A Redacted - Privilege

Redacted - Privilege

- updated the "Ip Legal Approval Status" to Redacted - Privilege
- updated the "Ip Legal Redacted - Privilege
- updated the "Ip Legal Notes" to Redacted - Privilege

Redacted - Privilege

David McAneny made several changes

June 28, 2024 · Hide updates

- updated the "Review Status" to "LEGAL_REVIEW"
- updated the "Download Considerations" to "Full datasets require download via torrent
  Can also search one off books, articles, etc on the website that can be dowloaded"
- updated the "Type Of Pii" to "full names, emails."
- updated the "Pii Present Text" to "Each dataset is hundreds of GB or TB of data, unable to download due to extreme size of datasets, in addition, full downloadable datasets are accessible via torrent, which is blocked
  Looking at sample metadata on the website indicates that it is possible for full names, and emails to be contained at least"
- updated the "Pii Present Flag" to "true"
- updated the "Login Required For Download Flag" to "false"
- updated the "Login Required For Download Text" to ""

- updated the "Scraping Prohibited In Tos Flag" to "false"
- updated the "Scraping Prohibited In Tos Text" to "Claims all code and data is open source
  Unsure of copyright requirements/obligations for each book, paper, etc. hosted on the website"
- updated the "Robots Txt Disallow Flag" to "true"
- updated the "Robots Txt Disallow Text" to "User-agent: *
  Crawl-delay: 10
  Disallow: /db
  Disallow: /slow_download
  Disallow: /fast_download
  Disallow: /torrents
  Disallow: /search
  Disallow: /scidb"
- updated the "Attributes Required Flag" to "false"
- updated the "Attributes Required Text" to "Don't need to credit anna's archive, however unsure of copyright or attribution requirements/obligations for each book, paper, etc. hosted on the website"
- updated the "Contain 1pd Flag" to "false"
- updated the "Contain 1pd Text" to "Each downloadable dataset is hundreds of GB or TB of data, unable to download due to extreme size of datasets. Did not observe 1PD in the observable data"
- updated the "Human Characterization Flag" to "true"
- updated the "Human Characterization Text" to ""
- updated the "Download Considerations" to "Each downloadable dataset is hundreds of GB or TB of data, unable to download due to extreme size of datasets, as a result unable to determine full scope.

  Searching on the website shows that there are human faces associated with full names"
- updated the "Scraping Notes" to "Previously reviewed in #D625 in spreadsheet. If you are interested in mirroring this dataset for archival or LLM training purposes, please contact us.

  Claims all code and data is open source. Sample metadata indicates that links from various news sources like NYTimes is contained"
- updated the "Review Status" to "IN_PROGRESS"
- updated the "Scraping Notes" to "Previously reviewed in #D625 in spreadsheet."

Xiaolan Wang created this dataset

June 27, 2024 · Like